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**From:** Keenan, Dru [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9525DC06E2E74BB89DA45F7E19B2E0CA-KEENAN, DRU]  
**Sent:** 5/3/2017 3:39:55 PM  
**To:** Mann, Laurie [mann.laurie@epa.gov]  
**Subject:** RE: Dam Question

Hi Laurie, I'm not sure what limits would be given, unless the TMDL specifically calls out a WLA to the facility. In general, what we are proposing in the first go round of the GP is to require monitoring then in the re-issuance of the permit determine if there is RP to exceed the temperature standard.

*Dru*

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**From:** Mann, Laurie  
**Sent:** Wednesday, April 26, 2017 5:17 PM  
**To:** Keenan, Dru <[keenan.dru@epa.gov](mailto:keenan.dru@epa.gov)>  
**Subject:** RE: Dam Question

That makes perfect sense, Dru. Thanks!

I'm curious – what kind of temperature limits will you give when there are temperature impairments in the waterbody?

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**From:** Keenan, Dru  
**Sent:** Wednesday, April 26, 2017 5:01 PM  
**To:** Mann, Laurie <[mann.laurie@epa.gov](mailto:mann.laurie@epa.gov)>  
**Subject:** Dam Question

Hi Laurie, sorry didn't have a chance to connect today and I'm off until next Wednesday. Susan knows the dam permit situation so you could check with her as well. Essentially, the general permit I'm writing for hydro-electric facilities in the state of Idaho (to be followed with a GP for federal hydro facilities in WA), is pertaining only to outfalls from the dam that discharge oil and grease ph, and temperature from non-contact cooling water. One major impetus behind developing the permit, is that the Columbia Riverkeepers sued the Army Corps on their dams in the Columbia (and sued the Bureau of Rec over Grand Coulee) because they were discharging oil and grease without a permit. The Corps and BOR settled and committed to get NPDES permit. We are starting with Idaho first for a number of other reasons.

In the permit/FS I make clear that the permit only pertains to discharges from a defined set of outfalls (4-5 in total) and not to water coming over or through the dam. Region 1 developed a similar GP for hydro facilities in NH and MA. Oregon has individual permits for similar outfalls for Bonneville, McNary, and John Day as well as several Idaho Power Dams on the Snake - -so it is not unprecedented.

FYI the size of the discharges are minute compared to the water flowing over and through the dam. Most discharges are intermittent. All of which is why these facilities weren't a high priority for our office until the suit and some stuff happening in ID.

Hope this helps

*Dru*

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